

EXHIBIT 1

LETTER OF REQUEST (LETTER ROGATORY)

TO: Clerk of Humansdorp Magistrate Court
Humansdorp Magistrate Court
Du Plessis St.
Humansdorp 6300 South Africa

**RE: Government of the United States Virgin Islands v. JPMorgan Chase Bank, N.A.
In the United States District Court for the Southern District of New York
Civil Action No. 1:22-cv-10904-JSR**

Dear Sir/Madam:

The above-captioned civil action is pending before the undersigned Judge of the United States District Court for the Southern District of New York. Plaintiff in the action seeks to obtain the deposition of Cathy Alexander and production of documents in her possession.

Thank you for your courtesy in this matter.

BY THE COURT

JED S. RAKOFF, U.S.D.J.

Dated: _____

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS

PLAINTIFF,

V.

JPMORGAN CHASE BANK, N.A.

DEFENDANT.

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Case Number: 1:22-cv-10904-JSR

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE

(LETTERS ROGATORY)

The United States District Court for the Southern District of New York presents its compliments to the Humansdorp Magistrate Court of South Africa, and requests international judicial assistance to obtain evidence to be used in a civil proceeding before this Court in the above captioned matter.

This Court requests the assistance described herein as necessary in the interests of justice. The assistance requested is that the appropriate judicial authority of South Africa compel the appearance of the below named individual to give evidence and produce documents.

The aforesaid mentioned individual:

Cathy Alexander

Residing at:

7 Harmonie Crescent, Paradise Beach, Jeffreys Bay 6330, South Africa

This Court requests Cathy Alexander produce all Documents, Communications, and agreements related to her employment by Jeffrey Epstein, including: employment and severance

agreements; non-disclosure agreements; all payments, in any form, received from or on behalf of Jeffrey E. Epstein; and all Communications with Jeffrey E. Epstein, Ghislaine Maxwell, Bella Klein, Daphne Wallace, Harry Beller, Lesley Groff, Sarah Kellen a/ka Sarah Kensington a/k/a Sarah Vickers, Erika Kellerhals, Richard D. Kahn, and/or Darren K. Indyke.

FACTS

1. The above-captioned case is currently pending in the United States District Court for the Southern District of New York.
2. Plaintiff alleges decedent Jeffrey E. Epstein engaged in a criminal sexual trafficking enterprise in the Virgin Islands, wherein he used his vast wealth and property holdings and a deliberately opaque web of corporations and companies to transport young women and girls to his privately-owned islands where they were held captive and subject to severe and extensive sexual abuse. Plaintiff further alleges that Defendant JPMorgan Chase Bank, N.A. and its affiliates had actual or constructive knowledge of Epstein's misconduct but nevertheless violated their statutory duties to report suspicious transactions from accounts held by them.
3. Upon information and belief, Cathy Alexander was employed by decedent Jeffrey E. Epstein as the house manager for his residence on Little St. James from approximately 1999 to 2007, and, as such, would have first-hand knowledge of Epstein's conduct and visitors at Little St. James.
4. In order to prepare the case for trial, Plaintiff needs to take the deposition of Cathy Alexander.
5. Plaintiff has previously attempted to obtain Cathy Alexander's deposition and run into obstacles attempting to depose her.

A Subpoena to Testify at a Deposition in a Civil Action is attached hereto, requesting Cathy Alexander appear to have her deposition taken, at a location to be determined, and produce documents thirty days after the date she is served with the Subpoena and Letter Rogatory.

The United States District Court for the Southern District of New York is willing to provide similar assistance to judicial authorities of South Africa. The United States District Court for the Southern District of New York is willing to reimburse the judicial authorities for costs incurred in executing this Letters Rogatory.

Thank you for your courtesy in this matter.

BY THE COURT

Dated: January _____, 2023

JED S. RAKOFF, U.S.D.J.
United States District Court
For the Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007
(212) 805-0401 Telephone